

PSJ3

Exhibit 671

1 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF OHIO
2 EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION	MDL No. 2804
4	
OPIATE LITIGATION	Case No. 1:17-MD-2804
5	
	Hon. Dan A. Polster
6 APPLIES TO ALL CASES	

8 Friday, May 31, 2019

10
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
12 CONFIDENTIALITY REVIEW

16 VIDEOTAPED DEPOSITION of MELANIE ROSENBLATT,
M.D., held at Morgan Lewis & Bockius LLP, 200 South
17 Biscayne Boulevard, Suite 5300, Miami, Florida,
commencing at 9:26 a.m., on the above date,
18 before Susan D. Wasilewski, Registered
Professional Reporter, Certified Realtime
19 Reporter and Certified Realtime Captioner.

23 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 Q. Okay. And you have served as one of those
2 key opinion leaders that have been compensated by
3 the pharmaceutical companies to come and speak?

4 A. That's correct.

5 Q. Okay. And let's just go through it quickly
6 so I understand. So the first time you served as a
7 key opinion leader was for Alpha Pharma in 2004 to
8 2006?

9 A. Yes.

10 Q. I think we talked about that earlier; is
11 that right?

12 A. Yes.

13 Q. And Alpha Pharma -- Alpha Pharma
14 manufactured an opioid product?

15 A. Yes.

16 Q. Okay. And did you have a contract to serve
17 as a key opinion leader for Alpha Pharma?

18 A. I don't think the contract spelled it out
19 that way.

20 MS. COATES: Objection.

21 A. I think I had a contract to participate as a
22 consultant.

23 Q. Okay. And generally, how were you paid for
24 that consulting arrangement?

25 A. To the best of my recollection, I was paid

1 \$750 per lecture.

2 Q. Okay. And did you give numerous lectures?

3 A. Yes.

4 Q. How many, in that time period?

5 A. I don't remember.

6 Q. Less than 20?

7 A. Yes.

8 Q. More than 10?

9 A. Maybe.

10 Q. Okay. It also lists a "National Sales
11 Meeting." Did you attend a national sales meeting
12 for Alpha Pharma in 2005?

13 A. Yes. I was their speaker for the national
14 sales meeting.

15 Q. Okay. What did -- what topic did you speak
16 on?

17 A. I -- I don't recall specifically. I would
18 imagine it was to present the new sales slide deck.

19 Q. Sales for what product?

20 A. Kadian.

21 Q. Okay. Who drafted the slide deck for that
22 presentation?

23 A. As far as I know, it was internal from the
24 Alpharma team.

25 Q. Generally, when you serve as a key opinion

1 leader and you're talking about a product, is the
2 slide deck or presentation drafted by the
3 pharmaceutical company?

4 A. Yes.

5 Q. Okay. Is it always?

6 A. All of the ones that I have given are, yes.

7 Q. Okay. You don't participate in the writing
8 of the content, correct?

9 A. Correct.

10 Q. Okay. Where was that national sales meeting
11 in 2005 where you were speaking about Kadian?

12 A. I don't remember.

13 Q. Did you -- did the pharmaceutical company
14 pay for your travel to that national sales meeting?

15 A. Yes.

16 Q. Did the pharmaceutical company, Alpha
17 Pharma, pay for your travel to any of these
18 lectures?

19 A. Yes.

20 Q. While you were at the national sales
21 meeting, did they pay for your meals and hotel room?

22 A. Yes.

23 Q. Let's take Medtronic. You served as a key
24 opinion leader for Medtronic from 2005 to 2008; is
25 that right?